

June 19, 2017

Heather Shannon
Division of Integrated Regional Water Management
California Department of Water Resources
P.O. Box 942836
Sacramento, CA 94326-0001

Delivered by electronic mail to: SGWP@water.ca.gov

Re: Draft Proposal Solicitation Package for Groundwater Sustainability Plans and Projects:

Dear Ms. Shannon:

On behalf of the California Water Association (CWA), I am writing to comment on the Proposal Solicitation Package (PSP) for Groundwater Sustainability Plans (GSPs) and Projects. CWA represents more than 100 investor-owned public water utilities in California that are regulated by the California Public Utilities Commission (CPUC). Its members provide safe, reliable, high-quality water service to approximately 6 million Californians.

CWA member companies are working hard with local agency partners to support the successful implementation of the Sustainable Groundwater Management Act (SGMA). The PSP for this round of funding appears to deny requests for funding from basins that have filed alternative plans. If approved in this form, it will deny the ratepayers and taxpayers in areas that have submitted alternative plans from the benefit of state funding assistance and put them at a disadvantage relative to their counterpart ratepayers and taxpayers in areas that filed GSPs.

Many of the areas that have submitted alternative plans are in sub-basins which, while meeting the requirement of documenting their basin sustainability, will still require additional work to comply with the terms of SGMA. This additional work includes building regional water budgets and groundwater flow models that incorporate neighboring sub-basins and basins, as well as the required coordination plans to help address sustainability across the larger basin and neighboring basins. CWA respectfully suggests that the Department of Water Resources is placing an additional financial burden by denying funding for areas that have developed groundwater management plans and filed them as Alternative Plans.

If you have any questions about our position, please do not hesitate to contact me at (415)561-9650 or Jennifer Capitolo, Senior Policy Advisor at Nossaman LLP, at (916) 442-8888. Thank you for your consideration of CWA's views.

Sincerely,



Jack Hawks

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